

1 Janet Brown
2 9 Carpenter Court
3 San Francisco, California [94124]
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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 San Francisco Division
10
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12 Janet Brown,
13 Plaintiff/Petitioner,
14 v.
15 CITY OF SAN FRANCISCO et al.,
16 Defendant/Respondent
17

Case No.: 24-cv-00466-LB

ADDENDUM TO COMPLAINT

18
19 Plaintiff, Janet Brown, hereby submits this Addendum to the complaint filed in the
20 above-captioned matter, stating as follows:
21

22 **I. City and County of San Francisco - Illegal Recording of Deed of Trust**

23 The City and County of San Francisco, acting through its agents and employees, unlawfully
24 recorded the Deed of Trust on November 22, 2021 without any statutory or legal requirement
25 to do so. There exists no law or statute in California or the United States that mandates such a
26 recording when the property at issue is the subject of disputed ownership and title. This
27 recording, therefore, constitutes an overreach and abuse of municipal powers, resulting in the
28 improper foreclosure of the Plaintiff's property. Plaintiff seeks declaratory relief invalidating the

1 Deed of Trust recorded by the City and County of San Francisco and damages for the harm
2 caused by this illegal act.

3
4 **II. David G. Winford, et al. - Real Estate Fraud and Conspiracy**

5 David G. Winford and his associates conspired to commit real estate fraud by failing to verify
6 ownership of the subject property before initiating and proceeding with the illegal foreclosure,
7 sale, and auction. Despite having access to records indicating a lack of legitimate ownership
8 transfer, Winford and his associates chose to willfully ignore such evidence, perpetuating a
9 fraudulent foreclosure process. This fraudulent scheme deprived Plaintiff of their legal and
10 rightful ownership of the property. Plaintiff seeks damages and equitable relief, including
11 restitution and punitive damages, against David G. Winford and all involved co-conspirators
12 for their unlawful actions.

13
14 **III. Derik N. Lewis, Esq. - Legal Malpractice**

15 Plaintiff further asserts that Derik N. Lewis, Esq., provided negligent legal advice by
16 recommending that the subject property be removed from its Trust to allegedly "protect" it.
17 This advice directly resulted in a weakened legal position for the Plaintiff and contributed to
18 the unlawful foreclosure process. By advising the Plaintiff to take an action that was contrary
19 to their best interests, Derik N. Lewis engaged in legal malpractice. Plaintiff seeks damages
20 for the harm caused by this erroneous legal counsel, including the loss of property and
21 emotional distress.


22
23
24 **PRAYER FOR RELIEF**

25
26 WHEREFORE, Plaintiff respectfully requests that this Court grant the following relief:
27
28

1. An order invalidating the Deed of Trust recorded by the City and County of San Francisco;
2. Compensatory and punitive damages against all Defendants, including David G. Winford and associates, for real estate fraud and conspiracy;
3. Damages for legal malpractice against Defendant Derik N. Lewis, Esq.;
4. Attorneys' fees, costs, and any other relief the Court deems just and equitable.

Dated: September 30, 2024

Respectfully submitted,



Janet Brown

Plaintiff, Pro Se

Attached you will find all 4 proofs of service, which in using a process server, I believed they would be providing those to the court.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Bar number, and address): Janet Brown <browney2014@gmail.com> 9 Carpenter Ct TELEPHONE NO.: 415-377-0058 FAX NO. (Optional): EMAIL ADDRESS (Optional): ATTORNEY FOR (Name): JANET BROWN			FOR COURT USE ONLY	
United States District Court, Northern District of California STREET ADDRESS: 450 Golden Gate Ave. 16th Floor MAILING ADDRESS: 450 Golden Gate Ave. 18th Floor CITY AND ZIP CODE: San Francisco 94109 BRANCH NAME: Philip Burton Federal Building				
PLAINTIFF/PETITIONER: JANET BROWN			CASE NUMBER	
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA			24-CV-00466-LB	
PROOF OF SERVICE	HEARING DATE/TIME: 04/25/2024 11:00 AM	HEARING DEPT./DIV.:	Ref. No. or File No. CV24-0466 LB	

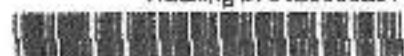
1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of (specify documents):
SUBPOENA; ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES
3. a. Party served (specify name of party as shown on documents served):
ZBS Law, LLP
- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b whom substituted service was made) (specify name and relationship to the party named in item 3a):
 Kim Bowers, I delivered the documents to Kim Bowers who identified themselves as the person authorized to accept with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a brown-haired white female contact 55-65 years of age, 5'6"-5'8" tall and weighing 140-160 lbs with glasses.
4. Address where the party was served:
 30 Corporate Park, Ste 450, Irvine, CA 92606
5. I served the party (check proper box)
- a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 03/06/2024 at (time): 10:49 AM
- b. ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
- (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
- (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
- (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
- (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

BY FAX



REF: CV24-0466 LB

PROOF OF SERVICE

 Page 1 of 2
 Code of Civil Procedure, § 10.11
 Tracking #: 0126506291


PLAINTIFF/PETITIONER: JANET BROWN	CASE NUMBER:
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA	24-CV-00466-LB

- c. ☐ by mail and acknowledgement of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the Notice and Acknowledgement of Receipt and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40)
- d. ☐ by other means (specify means of service and authorizing code section):
- ☐ Additional page describing service is attached.

6. Person who served papers

- a. Name: James Stoner
- b. Address: 2226 Private RD, Newport Beach, CA 92660
- c. Telephone number: 949-423-8815
- d. The fee for service was: \$ 140.00
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:

(i) ☐ owner ☐ employee ☒ independent contractor.

(ii) ☒ Registration No.: 8282

(iii) ☒ County: County Of Orange

For: ABC Legal Services, LLC

Registration #: 8778

County: Los Angeles

7. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
8. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 03/06/2024

James Stoner

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

James Stoner

(SIGNATURE)

BY FAX



REF: CV24-0466 LB

PROOF OF SERVICE

Tracking #: 0126506291



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Bar number, and address): Janet Brown <brownjary2014@gmail.com> 9 Carpenter Ct TELEPHONE NO.: 415-377-0068 FAX NO. (Optional) E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): JANET BROWN		FOR COURT USE ONLY	
United States District Court, Northern District of California STREET ADDRESS: 450 Golden Gate Ave. 18th Floor MAILING ADDRESS: 450 Golden Gate Ave. 18th Floor CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME: Philip Burton Federal Building			
PLAINTIFF/PETITIONER: JANET BROWN		CASE NUMBER:	
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA		24-CV-00466-LB	
PROOF OF SERVICE	HEARING DATE/TIME: 08/25/2024 11:00 AM	HEARING DEPT./DIV.:	Ref. No. or File No.: CV24-0466 LB

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of (specify documents):
SUBPOENA; ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES
3. a. Party served (specify name of party as shown on documents served):
VANTIS LAW FIRM CORPORATION
- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b whom substituted service was made) (specify name and relationship to the party named in item 3a):
 Erica Martinez, I delivered the documents to Erica Martinez who identified themselves as the person authorized to accept with identity confirmed by subject saying yes when named. The individual accepted service with direct delivery. The individual appeared to be a black-haired Hispanic female contact 36-46 years of age, 5'4" -5'6" tall and weighing 120-140 lbs with glasses.
4. Address where the party was served:
120 Vantis Dr, Ste 300, Aliso Viejo, CA 92656
5. I served the party (check proper box)
- a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **03/06/2024** at (time): **11:24 AM**
- b. ☐ by substituted service. On (date): _____ at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3): _____
- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
- (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
- (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
- (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): _____ from (city): _____ or ☐ a declaration of mailing is attached.
- (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

BY FAX



REF: CV24-0466 LB

PROOF OF SERVICE

 Page 1 of 2
 Code of Civil Procedure, § 1011
 Tracking #: 0126511763


PLAINTIFF/PETITIONER: JANET BROWN	CASE NUMBER:
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA	24-CV-00466-LB

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgement of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgement of Receipt*) (Code Civ. Proc., § 415.30)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

B. Person who served papers:

- a. Name: James Stoner
- b. Address: 2226 Private RD, Newport Beach, CA 92880
- c. Telephone number: 949-423-6916
- d. The fee for service was: \$ 140.00
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server.
- (i) ☐ owner ☐ employee ☒ independent contractor.
- (ii) ☒ Registration No.: 6262
- (iii) ☒ County: County Of Orange

For: ABC Legal Services, LLC
 Registration #: 8778
 County: Los Angeles

7. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
8. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 03/06/2024

James Stoner

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

[Signature]

(SIGNATURE)

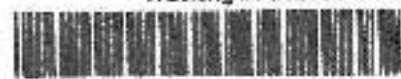
BY FAX



REF: CV24-0466 LB

PROOF OF SERVICE

Tracking #: 0126511763



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Bar number, and address): Janet Brown <brownjay2014@gmail.com> 8 Carpenter Ct TELEPHONE NO.: 415-377-4058 FAX NO. (Optional): E MAIL ADDRESS (Optional): ATTORNEY FOR (Name): JANET BROWN		FOR COURT USE ONLY	
United States District Court, Northern District of California STREET ADDRESS: 450 Golden Gate Ave. 16th Floor MAILING ADDRESS: 450 Golden Gate Ave. 16th Floor CITY AND ZIP CODE: San Francisco 94102 BRANCH NAME: Phillip Burton Federal Building			
PLAINTIFF/PETITIONER: JANET BROWN		CASE NUMBER:	
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA		24-CV-00466-LB	
PROOF OF SERVICE	HEARING DATE/TIME: 04/25/2024 11:00 AM	HEARING DEPT/JDM:	Part No. or File No.: CV24-0466 LB

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of (specify documents):
SUBPOENA; ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE AND ADR DEADLINES
3. a. Party served (specify name of party as shown on documents served):
Shirley N. Weber, Ph.D.
- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b whom substituted service was made) (specify name and relationship to the party named in item 3a):
Susie Lao, Deputy SOS, I delivered the documents to Susie Lao, Deputy SOS who identified themselves as the deputy secretary of state with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a black-haired Asian female contact 25-35 years of age, 5'6" -5'8" tall and weighing 140-150 lbs with an accent.
4. Address where the party was served:
1500 11th St, Sacramento, CA 95814
5. I served the party (check proper box)
- a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **03/08/2024** at (time): **1:21 PM**
- b. ☐ by substituted service. On (date): _____ at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3): _____
- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
- (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
- (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
- (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., § 415.20). I mailed the documents on (date): _____ from (city): _____ or ☐ a declaration of mailing is attached.
- (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

BY FAX



REF: CV24-0466 LB

PROOF OF SERVICE

 Page 4 of 2
 Code of Civil Procedure, § 1011
 Tracking #: 0126733361


PLAINTIFF/PETITIONER: JANET BROWN	CASE NUMBER:
DEFENDANT/RESPONDENT: CITY OF SAN FRANCISCO, CALIFORNIA	24-CV-00466-LB

- c. ☐ by mail and acknowledgement of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the Notice and Acknowledgement of Receipt and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. Person who served papers

- a. Name: Kenneth Woo
- b. Address: 4010 Foothills Blvd, Suite 103-73, Roseville, CA 95747
- c. Telephone number: 916-796-2799
- d. The fee for service was: \$ 140.00
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:

- (i) ☐ owner ☐ employee ☒ independent contractor.
- (ii) ☒ Registration No.: 16-003
- (iii) ☒ County: Placer County CA

For: ABC Legal Services, LLC
 Registration #: 8779
 County: Los Angeles

7. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

8. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 03/08/2024

Kenneth Woo

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

KWoo

(SIGNATURE)

BY FAX

PROOF OF SERVICE

Tracking #: 0126733381



REF: CV24-0466 LB



PROOF OF SERVICE

I, the undersigned, declare that I served the Notice(s) below indicated:

AFFIDAVIT OF NOTICE REGARDING PRIVATE ESTATE

The above described Notice(s) were served on the following named parties in the manner set forth below:

NAME: **Joaquin Torres**
 ADDRESS: **1 Dr Carlton B Goodlett Pl, Ste 190, San Francisco, CA 94102**

☒ **1. PERSONAL SERVICE** By delivering a copy of the Notice(s) to each of the above personally:
 (1) on: **03/28/2024**
 (2) at: **12:45 PM**

At the time of service, I was at least 18 years of age. I declare under penalty of perjury that the foregoing is true and correct.

Person who served papers

a. Name: **Oscar Preciado**
 b. Address: **84 29th st, San Francisco, CA 94110**
 c. Telephone number: **415-665-9418**
 d. The fee for service was: **\$ 140.00**
 e. I am:

- (1) ☐ not a registered California process server.
 (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
 (3) ☒ registered California process server:

(i) ☐ owner ☐ employee ☒ independent contractor. For: **ABC Legal Services, LLC**
 (ii) ☒ Registration No.: **6779**
 (iii) ☒ County: **Alameda county** County: **Los Angeles**

☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.Date: 03/29/2024Oscar Preciado

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



(SIGNATURE)



REF: REF-15426222

PROOF OF SERVICE

Tracking #: 0128578801

